

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GREGORY FORSBERG,)	
CHRISTOPHER GUNTER, SAMUEL)	
KISSINGER, AND SCOTT)	C.A. No. 1:22-cv-00436-VAC
SIPPRELL, individually and on behalf)	
of all others similarly situated,)	
)	JURY TRIAL DEMANDED
Plaintiffs,)	
)	
v.)	
)	
SHOPIFY, INC., SHOPIFY)	
HOLDINGS (USA), INC., SHOPIFY)	
(USA) INC., and TASKUS, INC.,)	
)	
Defendants.)	

AMENDED JOINT STIPULATION OF DISMISSAL

WHEREAS, on July 28, 2025, Plaintiffs Gregory Forsberg, Christopher Gunter, Samuel Kissinger, And Scott Sipprell (“Plaintiffs”), filed a notice of voluntary dismissal with respect to all claims asserted against Defendants Shopify, Inc., Shopify Holdings (USA), Inc., Shopify (USA) Inc., and TaskUs, Inc. (“Defendants”) (D.I. 133), which this Court signed on July 29, 2025. D.I. 134.

WHEREAS, prior to Plaintiffs’ dismissal filing, Plaintiffs and Defendant TASKUS, INC. agreed that Plaintiffs would file a joint stipulation of dismissal that contained the following language:

In stipulating to dismissal, the Parties acknowledge that Defendants continue to dispute the claims set forth in the action and have denied and continue to deny any wrongdoing or that they have any liability to

Plaintiffs or any member of any putative class for any such claim asserted.

Plaintiffs did not file that document as agreed and filed a Notice of Voluntary Dismissal instead. Plaintiffs maintain they had valid reasons for doing so, and Defendant contends that these stated reasons are meritless.

WHEREFORE, IT IS STIPULATED AS FOLLOWS:

1. Plaintiffs hereby voluntarily dismiss the claims asserted in this action, with prejudice.
2. Defendants stipulate to the dismissal.
3. In stipulating to dismissal, the Parties acknowledge that Defendants continue to dispute the claims set forth in the action and have denied and continue to deny any wrongdoing or that they have any liability to Plaintiffs or any member of any putative class for any such claim asserted.
4. All of Plaintiffs' claims are hereby dismissed with prejudice.
5. Each party will bear their own fees and costs.

DELEEUEW LAW LLC

Of Counsel:

Nicholas A. Migliaccio
Jason S. Rathod
MIGLIACCIO & RATHOD, LLP
412 H Street, NE, Suite 302
Washington, DC 20002
(202) 470-520

/s/ P. Bradford deLeeuw
P. Bradford deLeeuw (#3569)
1301 Walnut Green Road
Wilmington, DE 19807
(302) 274-2180
brad@deleewlaw.com

Attorneys for Plaintiffs

**RICHARDS, LAYTON &
FINGER, P.A.**

Of Counsel:

Moez M. Kaba
Allison L. Libeu
Sourabh Mishra
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014
(213) 788-4340

/s/ Kelly E. Farnan
Kelly E. Farnan (#4395)
Tyler E. Cragg (#6398)
Richards, Layton & Finger, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7700
farnan@rlf.com
cragg@rlf.com

*Attorneys for Defendants Shopify Inc.,
Shopify Holdings (USA) Inc., and Shopify
(USA) Inc.*

COZEN O'CONNOR

Of Counsel:

Spencer Persson
DAVIS WRIGHT TREMAINE LLP
350 S. Grand Avenue, 27th Floor
Los Angeles, CA 90071
(213) 633-6800

/s/ Kaan Ekiner
Kaan Ekiner (#5607)
Cozen O'Connor
1201 North Market Street, Suite 1001
Wilmington, DE 19801
(302) 295-2046
kekiner@cozen.com

Seth Tangman
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Ave., Suite 2400
Portland, OR 97201
(503) 241-2300

Attorneys for Defendant TaskUs, Inc.

Dated: September 2, 2025